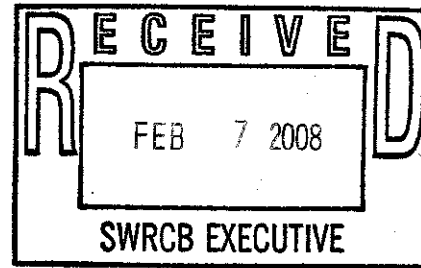


# ORANGE COUNTY SANITATION DISTRICT

2/19/08 BdWrkshp Item 10  
Water Quality Enf. Policy  
Deadline: 2/7/08 by 12 p.m.

February 7, 2008



Tam Doduc, Chair, and Members  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814

**SUBJECT: WATER QUALITY ENFORCEMENT WORKSHOP – February 19, 2008**

The Orange County Sanitation District (OCSD) appreciates the opportunity to review and comment on the State Water Resources Control Board's (SWRCB) proposed Enforcement Policy. OCSD is a public agency responsible for collecting, treating and managing wastewater for 2.4 million residents and businesses within northern and central Orange County. OCSD operates pursuant to an NPDES permit for discharges into the Pacific Ocean. OCSD conducts its own enforcement on dischargers as part of our Pretreatment Program. Therefore, we are keenly aware of the importance of utilizing enforcement measures to address water quality issues.

## General Comments

OCSD agrees with the SWRCB's commitment to fair, timely and consistent enforcement of the laws they are required to implement. OCSD supports the policy of the SWRCB to initiate enforcement actions that are "*appropriate in relation to the nature and severity of the violation*" while also recognizing the unique circumstances of each individual case.

OCSD strongly recommends the SWRCB maintain flexibility with the implementation of its supplemental environmental projects (SEP), and allow the maximum amount of SEPs to be used in the same region where the enforcement action occurred. The SWRCB should adopt a "watershed-based approach" with its enforcement program by allowing local resources to address local water quality issues. The Santa Ana Regional Water Quality Control Board already maintains a list of SEPs that are prioritized based on watershed.

OCSD also supports the opinions and recommendations expressed by the California Association of Sanitation Agencies, Tri-TAC, the Bay Area Clean Water Agencies, the California Water Environment Association, the Central Valley Clean Water Association and the Southern California Alliance of POTWs in their joint *Water Quality Enforcement Workshop – February 19, 2008* comment letter.

Thank you for your consideration of my comments on the SWRCB's Enforcement Policy. Please contact me at (714) 593-7461 if you have any questions.

*Karen Baroldi*

Karen Baroldi  
Regulatory Specialist

KB:wh

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